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RhodesHieronymus
O K L A H O M A

Reply to: Theresa Noble Hill
thill@rhodesokla.com

August 27, 2007

Via Email Only

Robert A. Nance
Riggs, Abney, Neal, Turpen, Orbison & Lewis
5801 Broadway Extension, Suite 101
Oklahoma City, OK 73118

Re: *State of Oklahoma v. Tyson*
Our File No. 1790-2

Dear Bob:

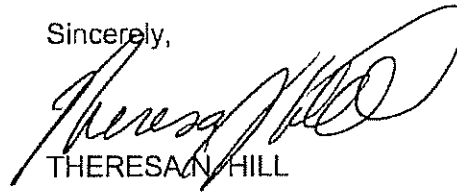
While we are sensitive to the goal of minimizing the burden and expense on all parties to this litigation, we do not believe that the topics in the Cargill Defendants' 30(b)(6) deposition notices are appropriate for consolidation with any future notice that may be served by other Defendants.

Our Notices are specific to the State's allegations against the Cargill Defendants. We are seeking to depose a representative on what information the State has concerning its allegations against the Cargill Defendants specifically. We do not seek to depose a representative of the State concerning the actions of other Defendants. Many of the topics seek site specific information, such as "[t]he dates, locations and manner in which the Cargill Defendants or their contract growers have failed to properly manage, store or dispose of their poultry litter/poultry waste."

At this time, no other Defendant has served the State with similar 30(b)(6) deposition notices. We have forwarded your correspondence to our co-defendants upon your request. However, in light of the Scheduling Order, it is not realistic to delay any discussion of a schedule for these depositions until such time as another party might issue a similar notice. We are anxious to move forward and confirm dates to complete these depositions prior to the end of September. Please advise us of your availability.

Robert A. Nance
August 27, 2007
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Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Hill", written over the printed name. The signature is fluid and cursive, with a large loop at the end.

THERESA HILL

TNH:man

cc: John Tucker
Del Ehrich
Dara Mann
Bruce Jones